

**INFORMATION COLLECTION REQUEST
PART A: SUPPORTING STATEMENT**

FOR

**MILESTONES PLAN FOR THE BLEACHED PAPERGRADE KRAFT
AND SODA SUBCATEGORY OF THE
PULP, PAPER, AND PAPERBOARD POINT SOURCE CATEGORY
(40 CFR PART 430)**

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U.S. Environmental Protection Agency
Office of Water
Engineering and Analysis Division
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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a). Title of the Information Collection

ICR: Milestones Plan for the Bleached Papergrade Kraft and Soda Subcategory of the Pulp, Paper, and Paperboard Point Source Category (EPA ICR No. 1877.01).

1(b). Short Characterization/Abstract

This information collection is new. The information to be collected is a Milestones Plan, which is required as part of a new Voluntary Advanced Technology Incentives Program (VATIP) established under the Pulp, Paper, and Paperboard Effluent Limitations Guidelines and Standards (40 CFR Part 430) portion of the Cluster Rule promulgated on April 15, 1998. Only direct discharging bleached papergrade kraft and soda mills are eligible to participate in the VATIP. Furthermore, the Milestones Plan is required only of those mills that voluntarily choose to enroll in the incentives program.

The VATIP (40 CFR 430.24(b)) is intended to encourage existing and new direct discharging mills to move beyond today's baseline BAT and NSPS technologies toward the "mill of the future," which EPA believes will have a minimum impact on the environment. In order to facilitate achievement of the ultimate effluent limitations required by this incentives program, existing mills that choose to enroll in this voluntary program are required to submit plans (referred to as "Milestones Plans") detailing the strategy the mill will follow to develop and implement the technologies or processes it intends to use to achieve the requirements of the program. See 40 CFR 430.24(c). New sources enrolling in the Incentives Program are not required to develop Milestones Plans because they must achieve the ultimate VATIP standards as soon as they commence discharge.

The purpose of the Milestones Plan is to provide information necessary for the development of interim limitations or permit conditions under 40 CFR 430.24(b)(2) that lead to achievement of the Voluntary Advanced Technology BAT limitations codified at 40 CFR 430.24(b)(3) and (4). Each Milestones Plan must be developed by the participating mill and submitted to the NPDES permitting authority (i.e., EPA or the state, if it is authorized to administer the NPDES permitting program). EPA expects the permitting authority to use the information contained in the Milestones Plan to establish enforceable permit limitations and conditions for the participating mill. These milestones would also provide valuable benchmarks for reasonable inquiries into progress being made by participating mills toward achievement of the interim and ultimate effluent limitations. EPA's legal authority to require such Milestones Plans in effluent limitations guidelines and standards is found in Section 308(a) of the Clean Water Act (CWA). For additional information on the VATIP, see the Technical Support Document for the Voluntary Advanced Incentives Program (EPA-821-R-97-014; DCN 14488).

For the regulated community, the burden and costs of the Milestones Plan are those associated with its development. For the government, the burden and costs are those sustained

by the NPDES permitting authority and EPA in reviewing the Milestones Plan, deriving and enforcing interim permit requirements and generally tracking the mill's implementation of the Milestones Plan.

It is estimated that this information collection will involve about 29 industry respondents at a total cost of about \$480,900. Tables 5 and 6 summarize the bottom line total burden and estimated cost.

2. NEED FOR AND USE OF THE COLLECTION

2(a). Need/Authority for the Collection

The incentives program requires achievement of ultimate effluent limitations that go beyond the baseline BAT limitations. Mills that choose to enroll in the program are given additional time to achieve those ultimate effluent limitations. During this additional time period during which the mill is preparing to meet the ultimate limitations, the regulation requires participating mills to meet interim limitations or permit conditions. See 40 CFR 430.24(b)(2). In order to determine interim limitations or permit conditions that will take into account the special circumstances at each mill while at the same time promote timely achievement by the mill of the ultimate limitations, the permitting authority needs to know the details of how the mill is planning to develop and implement the technologies and processes to achieve the ultimate limitations. The Milestones Plan, prepared by the mill, will provide this information. The Milestones Plan will also provide valuable benchmarks for reasonable inquiries into progress being made toward achievement of the ultimate limitations and will help ensure that mills enrolled in the program are making a good-faith effort to fulfill the requirements of the program.

EPA's legal authority to require Milestones Plans for meeting effluent limitations is found in Section 308(a) of the Clean Water Act. Section 308(a) gives the EPA Administrator the authority to require the owner or operator of any point source (e.g., a pulp and paper mill) to make reports or provide such other information that the Administrator determines is necessary to (1) develop any effluent limitation or other limitation under the Act, (2) determine compliance with effluent limitations, or (3) carry out the NPDES permit program. The Milestones Plan fits all three criteria for the reasons set forth in paragraph 2(b) below.

2(b). Practical Utility/Users of the Data

The Milestones Plan will assist the permitting authority (i.e., the state or EPA) to set appropriate interim limitations and permit conditions for that interim period when the mill is preparing to achieve the ultimate limitations. An individualized Milestones Plan will make it easier for the permitting authority to account for any unique situations at the mill and to provide appropriate flexibility for the mill.

The Milestones Plan will also enable the permitting authority to track the progress being

made by the mill to achieve the interim and ultimate effluent limitations and to enable the permitting authority to recognize if and when a mill is not making expected progress toward fulfilling the requirements of the program and take appropriate action. By advancing these purposes, the Milestones Plan thus helps to carry out the NPDES permit program.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a). Nonduplication

The information in the Milestones Plan is necessarily mill-specific and, to EPA's knowledge has never been collected by another source. Therefore, none of the information to be collected by the Milestones Plan is available elsewhere. Moreover, although EPA expects that many participating mills will already be developing such plans for their own planning purposes, the permitting authority would have no access to this information without this information collection request.

3(b). Public Notice Required Prior to ICR Submission to OMB

This information collection request (ICR) is discussed in 63 FR 19795-18802 (April 15, 1998), "Amendments to the Effluent Limitations Guidelines, Pretreatment Standards, and New Source Performance Standards for the Bleached Papergrade Kraft and Soda Category of the Pulp, Paper, and Paperboard Point Source Category." In the FR Notice, EPA presented the information collection requirements and estimates of the burden and costs and solicited public comments on the estimates of burden and costs. No adverse comments were received on the burden estimates related to the Milestones Plan.

3(c). Consultations

EPA has discussed this information collection with the state NPDES permitting authorities.

3(d). Effects of Less Frequent Collection

Since the Milestones Plan is a one-time information collection and not a collection with periodic reporting, consideration of the effects of less frequent collection is not relevant.

3(e) General Guidelines

None of OMB's general guidelines for information collections will be violated by this information collection.

3(f) Confidentiality

EPA does not expect that the majority of the information requested for the Milestones Plan will be confidential business information (CBI). However, EPA received two comments on the proposed Milestones Plan regulation (63 FR 18796, April 15, 1998) indicating that a mill may wish to claim as CBI the technologies or processes by which it intends to achieve the ultimate VATIP limitations. EPA agrees that this situation could occur. Therefore, EPA is considering promulgating language in the final rule to provide that, in those situations, a mill may claim that portion of the Milestones Plan as confidential. Such claims would then be handled pursuant to 40 CFR Part 2 when EPA is the permitting authority and applicable state rules and regulations governing CBI when states are the permitting authorities.

Additionally, because EPA is considering clarifying a mill's rights under 40 CFR Part 2 to assert CBI claims in connection with its Milestones Plan submission, EPA is considering adding language to the regulation that would require mills asserting a CBI claim to prepare a public summary of the confidential portion of the plan and to submit that summary to the permitting authority along with the Milestones Plan. This requirement would allow the public, on request, to obtain information about the mill's progress in achieving its VATIP limitations.

3(g) Sensitive Questions

No sensitive questions are anticipated in this information collection.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/SIC Codes

The respondents will be those existing, direct-discharging bleached papergrade kraft and soda pulp and paper mills that have chosen to enroll in the VATIP. The SIC code associated with these potential respondents is 2611 (pulp mills).

4(b). Information Requested

An existing mill choosing to enroll in the VATIP must submit a Milestones Plan.

(I) Data items:

! A Milestones Plan required under 40 CFR 430.24(c).

-- The Milestones Plan must describe each anticipated new technology component or process modification the mill intends to implement in order to achieve the ultimate effluent limitations (i.e., the Voluntary Advanced Technology BAT limits). This information is required

under 40 CFR 430.24(c)(1) (see DCN 14488).

- In addition, the Milestones Plan must include a master schedule (1) showing the sequence of implementing the new technology components or process modifications and (2) identifying critical path relationships. This information is required under 40 CFR 430.24(c)(2).
- For each individual new technology component or process modification, the Milestones Plan must include a schedule that identifies the anticipated dates when associated construction, installation, and operational “shakedown” will be initiated, the anticipated dates those steps will be completed, and the anticipated date that the full Advanced Technology process or individual component will be fully demonstrated as operational. EPA also intends that the Milestones Plan describe the anticipated improvements in effluent quality and reductions in effluent quantity as measured at the bleach plant and at the end of the pipe.
- The schedule must also identify the anticipated dates of initiation and completion of associated research, process development and mill trials when applicable, i.e., when the mill intends to employ technologies or process modifications that are not commercially available or demonstrated on a full-scale basis at the time the Milestones Plan is developed. This “R&D Schedule,” which should be part of the Master Schedule, should show major milestone dates and the anticipated date the technology or process change will be available for mill implementation. This information is required under 40 CFR 430.24 (c)(3)(I).
- The Milestones Plan must also include contingency plans in the event that any of the technologies or processes need to be adjusted or alternative approaches developed to ensure that the ultimate effluent limitations are achieved by deadlines specified in 40 CFR 430.24(b)(4)(ii). This information is required under 40 CFR 430.24(c)(3)(iii).

(ii) Respondent Activities:

- ! Preparation of the Milestones Plan, containing the information described above.
- ! Signature by the responsible corporate officer as defines by 40 CFR 122.22, and submittal of the Milestones Plan to the permitting authority. These

activities are required by 40 CFR 430.24© and (c)(4).

5. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a). AGENCY ACTIVITIES

Agency (i.e., permitting authority) activities associated with the Milestones Plans consist of the following:

- ! Review Milestones Plans for completeness.
- ! Consider the information in those plans when establishing enforceable interim effluent limitations and permit conditions that facilitate the achievement of the ultimate effluent limitations; include reopener clauses to allow the permitting authority to adjust the permits to reflect the results of research, process development, mill trials, and possible contingencies.
- ! Monitor progress of the participating mills toward achieving the ultimate effluent limitations, using the milestones in the Milestones Plan as benchmarks. Take appropriate action if and when progress falters.

5(b). COLLECTION METHODOLOGY AND MANAGEMENT

After having enrolled in the VATIP, a particular mill is required to submit the Milestones Plan to the permitting authority, which would consider the Plan as described in 5(a). The Milestones Plan is intended to be a dynamic document that will be adjusted to reflect the results of research, process development, mill trials, etc. EPA expects the Plan to be maintained on file by the mill and the permitting authority. Public access will be managed through standard procedures under the codified authorities (see 3(f) above).

5(c). SMALL ENTITY FLEXIBILITY

EPA considered less burdensome information collection mechanisms for small entities, but chose not to alter the collection procedure for the following reasons:

- ! This information collection will not have a significant economic impact on a substantial number of small entities. EPA has determined that, of all the pulp and paper mills that are eligible for the VATIP only three mills are small businesses, and EPA does not believe this is a substantial number as that term is used in EPA's Regulatory Flexibility Analysis for the Final Pulp and Paper Cluster Rules. (See the Economic Analysis, DCN 14649).

- ! Moreover, these three mills will be subject to the information collection only if they choose to enroll in the VATIP.
- ! Finally, the cost of this information collection to any small entity choosing to enroll in the VATIP is not substantial. EPA has calculated the cost to be between \$4,000 and \$50,000 per mill.

5(d). COLLECTION SCHEDULE

This is a one-time information collection. The participating mill must submit the Milestones Plan within 14 months from the date of publication of the final regulation imposing this information collection or by the date the mill applies for its NPDES permit limitations, whichever is later.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a). ESTIMATING RESPONDENT BURDEN

The respondent burden of this information collection has been estimated by calculating the labor requirements (in hours) of preparing typical Milestones Plans for each of the three possible technology tiers in the VATIP. The labor estimates assume that the Milestones Plans will be prepared by mill or corporate process engineering staff, with senior management input. These burden estimates cover the total time and effort expended by persons to generate, maintain, retain, and disclose or provide the information collection. This includes the time needed to review regulations and instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing or providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; and transmit or otherwise disclose the information.

Additionally, for Tiers II and III plan development, a budget is included to perform scoping studies to determine implementation at the mills. The estimates do not reflect the cost of detailed engineering studies or feasibility studies that a company may perform when investigating whether to pursue the development and installation of advanced technology, nor do the estimates include the labor hours related to internal corporate discussions about a decision to enroll in the incentives program. Such activities are considered part of the corporate strategic planning function and are not considered part of the burden associated with the Milestones Plan.

The labor estimates are based on the anticipated level of complexity for each of the tiers. The estimates reflect the greater complexity of higher tiers and were prepared by an EPA contractor with much experience preparing plans and schedules for projects with similar complexities. The estimate for a Tier I Milestones Plan assumes the mill will implement readily available technology (e.g., oxygen delignification and 100 percent chlorine dioxide substitution)

and will not perform research and development (R & D) activities. The estimate for a Tier II Milestones Plan assumes the mill will conduct one research and development project related to condensate reuse, but otherwise will implement readily available technology (e.g., a two-stage oxygen delignification system followed by ozone bleaching and 100 percent chlorine dioxide substitution). Additionally, the burden estimate for R & D scheduling only includes the cost of producing a schedule for this project. The estimate for a Tier III Milestones Plan assumes the mill will conduct six research and development projects designed to upgrade condensate quality from evaporators, to improve treatment of condensates, to provide advanced process control, to optimize water balance strategies to achieve nearly closed loop processing, and to remove minerals and/or chloride; the burden estimate for R & D scheduling only includes the cost of producing a schedule for this project. The following tables summarize the estimated industry respondent burden:

Table 1
Summary of Estimated Industry Respondent Burden

Technology Tier	Hours / Mill
Tier I	56
Tier II	154
Tier III	328

Table 2
Breakdown Estimate of Hours / Mill

Milestones Plan Element	Tier I Hours (X + Y)^a	Tier II Hours (X + Y)^a	Tier III Hours (X + Y)^a
Overview of Strategy	12 + 4	20 + 8	24 + 8
Description of New Technology Components or Process Modifications	10 + 2	20 + 4	32 + 8
Master Schedule	20 + 4	46 + 8	64 + 16
R & D Schedule	----	24 + 8	112 + 40
Appendix of Documentation ^b	4 + 0	16 + 0	24 + 0
Subtotal Hours	46 + 10	126 + 28	256 + 72
Total Hours	56	154	328

^a X = process engineering hours Y = senior management hours

^b Tier I: Includes vendor documentation or preliminary engineering studies.
Tier II: Includes the above (for Tier I) plus feasibility studies, research proposals and reports, and review of literature on minimum effluent technology.
Tier III: Includes the above (for Tier II) plus review of literature on closed-cycle technology.

6(b). ESTIMATING RESPONDENT COSTS

The respondent costs of this information collection have been estimated by taking the labor hours (in Table 2 above) and multiplying them by the appropriate wage rates applicable to process engineering time and senior management time. EPA estimates an average hourly cost (labor plus overhead) of \$65 for process engineering time and \$100 for senior management time. These cost estimates are based on EPA contractors' recent historical experience with typical, competitive rates for process engineering and senior management time. (There are no capital costs or O&M costs associated with this information collection.)

The following Table 3 summarizes the estimated industry respondent costs based on labor

effort:

Table 3
Summary of Estimated Industry Respondent Costs

Technology Tier	Engineering Hours / Mill	Management Hours / Mill	Costs / Mill^a
Tier I	46	10	\$3,990
Tier II	126	28	\$11,120
Tier III	256	72	\$23,840

^aAssumes \$65 and \$100 per hour for process engineering time and senior management time, respectively (labor plus overhead).

Additionally, for Tiers II and III, an allowance for scoping studies was included. For Tier II, EPA estimated approximately \$14,000 for each scoping study, which may be performed by a consultant. A scoping study estimate of \$26,000 was applied to Tier III. The extended costs, including labor and the scoping study estimate, are reflected in Table 4.

6(c). ESTIMATING AGENCY BURDEN AND COSTS

Estimates for Federal and State labor rates were based on the US Labor department figures, whereby the average annual salary for Federal and State employees is \$41,185; this is equivalent to the salary of a GS-9, Step 10 Federal employee. At 2,080 available labor hours per year, the hourly rate is \$19.80. Overhead costs for Federal and State employees are estimated by EPA to be 60 percent (EPA ICR Handbook), or \$11.88 per hour, which results in a total hourly rate of \$31.68 (\$19.80 + \$11.88).

EPA estimates the initial burden to State and local NPDES permitting authorities for the review of the Milestones Plan to be an average of 16 hours per mill respondent. With 29 mills anticipated to enter the program (see Section 6(d) below), the total initial State NPDES permitting authority burden is estimated at 464 hours. Based on the Federal and State labor rates, total initial labor costs are estimated at \$14,700 for State permitting authorities. It is anticipated that no one State permitting authority will incur the entire burden, because anticipated mill respondents are located in different states. There exists no more than four anticipated mill respondents in any one state. Therefore, the maximum initial burden that any one State permitting authority is 64 hours for a cost of \$2,030.

EPA estimates the recurring burden to State permitting authorities to be an average of 6 hours per year per mill for periodic review of the mill's progress in implementation of the Milestones Plan and to take appropriate action if and when progress falters (see section 5(a) above). The total recurring burden for State permitting authorities is estimated at 174 hours per

year at a total cost of \$5,500. The maximum recurring burden any one State permitting authority could incur is 24 hours per year at a cost of \$760. This maximum burden represents no more than 14% of the total estimated recurring burden.

The initial Agency burden is estimated to be an average of 20 hours per mill respondent. With 29 mills anticipated to enter the program (see Section 6(d) below), the total initial Agency burden is estimated at 580 hours. Based on the Federal and State labor rates, total initial labor costs are estimated at \$18,400 for the Agency. EPA estimates recurring burden to the Agency to be an average additional 4 hours per year per mill respondent for support of State and local NPDES permitting authorities. The total recurring burden for the Agency is estimated at 116 hours per year at a total cost of \$3,700.

6(d). ESTIMATING THE RESPONDENT UNIVERSE AND TOTAL BURDEN AND COST

As discussed previously, EPA estimates the potential respondent universe (i.e., the mills likely to enroll in the incentives program) to be 29 mills. The estimates of how many mills are likely to enroll in the incentives program for each of the three tiers are based on the following:

- ! There are 16 mills that already have technology in place that is comparable to that specified as the model technology required for Tier I or have a corporate commitment to install the technology. Two of those 16 mills, however, are projected to go to Tier III (see below). Therefore, the EPA estimate of how many mills are likely to enroll for Tier I is 14.
- ! EPA's projection on how many mills are likely to enroll for Tier II is based on the assumption that mills with over 400 kkg/day softwood production and with technology using minimal chlorine dioxide substitution are likely candidates to adopt Tier II technology. There are 12 mills that meet these criteria. One existing totally chlorine free kraft mill is also projected to enroll for Tier II, making a total of 13 mills projected to enroll for Tier II.
- ! There are two mills operated by a company developing technology to recycle bleach plant filtrate. These two mills are projected to enroll for Tier III.

The result is that 29 mills are projected to enroll in the incentives program -- 14 for Tier I, 13 for Tier II, and 2 for Tier III.

Total respondent burden and cost are calculated by multiplying the hours per mill and the costs per mill for each technology tier by the projected number of mills likely to enroll in the incentives program at that tier. The following Table 4 summarizes the total respondent burden and cost:

Table 4
Total Industry Respondent Burden and Cost

Technology Tier	Hours / Mill	Costs / Mill	# of Enrolled Mills	Total Hours	Total Cost^a
Tier I	56	\$3,990	14	784	\$55,900
Tier II	154	\$25,000	13	2,002	\$325,000
Tier III	328	\$50,000	2	656	\$100,000
TOTAL			29	3,442	\$480,900

^a Includes the cost of a scoping study for each mill.

6(e). BOTTOM LINE BURDEN HOURS AND COST TABLES

The bottom line burden hours and cost tables for respondents are the summaries of all the hours and costs incurred for all activities.

(i) Respondent Tally

The bottom line respondent (mills and State governments) is presented in Table 5 and 6.

(ii) The Agency Tally

The bottom line Agency tally is also presented in Table 5 and 6.

Table 5
Bottom Line Initial Burden and Costs Based on 29 Mills in
1998 Dollars

Category	Total Labor Hours	Total Labor Costs^a
Respondents - Subpart B and E mills	3,442	\$480,900
Respondents- State governments	464	\$14,700
Total Respondents	3,906	\$495,600
Agency	580	\$18,400

^a Includes the cost of a scoping study for each mill.

Table 6
Bottom Line Recurring Burden and Costs Based on 29 Mills
in 1998 Dollars

Category	Total Labor Hours	Total Labor Costs
Respondents - Subpart B and E mills	N/A	N/A
Respondents- State governments	174	\$5,500
Total Respondents	174	\$5,500
Agency	116	\$3,700

N/A indicates not applicable.

6(f). REASONS FOR CHANGE IN BURDEN

As this is a new information collection, there is no change in burden for this collection.

6(g). BURDEN STATEMENT

The burden for a mill (which chooses to participate voluntarily in the incentives program) to prepare and submit a Milestones Plan is estimated to average approximately 120 hours per respondent. This is a one-time burden. State NPDES permitting authorities burden to review the Milestones Plans is estimated at 16 hours per respondent as an the initial burden with a average recurring annual review burden of 6 hours per respondent. Agency burden to review the Milestones Plans is estimated at 20 hours per respondent as an the initial burden with a average recurring annual review burden of 4 hours per respondent.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments on the need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Include the EPA ICR number (1877.01) in any correspondence.